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United States District Court - District Of Massachusetts
1 Courthouse Way
2019 AUG 22 PM 12:14
Boston, Massachusetts 02210

U.S. DISTRICT COURT
DISTRICT OF MASS.
Laurence Brown,
pro se Plaintiff

Civil Action
NO. 17-cv-11688-IT

V.

Christopher Delmonte,
Chief of Police
Bridgewater, MA

Plaintiff's Response To Defendant Christopher Delmonte's
Initial Disclosures Pursuant to Fed.R.Civ.P.26(a)(1)

AND

Plaintiff's First Request For Production Of Documents

After reading "Defendant Christopher Delmonte's Initial Disclosures Pursuant to Fed.R.Civ.P.26(a)(1)" the first thought that came to mind was:

"Life's but a walking shadow, a poor player, That struts and frets his hour upon the stage, And then is heard no more. It is a tale Told by an idiot, full of sound and fury, Signifying nothing (Macbeth)."

Really? You want to use complainants, whose false testimony was previously discredited by the courts, in this case, as witnesses to again provide the same false testimony against me? Boy, that sounds like double jeopardy.

One good thing about your witness list is that it really highlights the passage of time.

For example, Amedeo Ditomasso moved to Florida and died about 10 years ago. He won't be helpful to you.

Tina Ditomasso moved out of state a few years ago. I've seen her around a few times. We don't talk. She still sees me as the reason for her parents divorce. Her complaint against me was so obviously fake that the judge dismissed the case, and promised to seal the record, before trial. If you can find her she might repeat her prior lies to you, if she remembers them.

Janet Shloss moved to Florida about 10 years ago. We see each other several times a year and are pleasant to each other. I doubt that she would repeat her lies to you. I doubt that she would even talk to you.

Christopher Delmonte's information is all hearsay which has been completely discredited by the court. Delmonte is very susceptible to police confirmation bias, disconfirmation bias, attitude polarization, belief perseverance, the irrational primacy effect, and illusory correlation. When new information that contradicts his initial opinions are found, he will ignore it.

Jessica and Taylor Freeborn are children that were forced to provide false testimony to the police by their mother, Diane Freeborn. Diane Freeborn has serious mental issues and is a child abuser. The Freeborn proceedings have been so discredited by the Brockton District Court that Judge Moynahan actually delivered a scathing rebuke IN OPEN COURT to Diane Freeborn for her lying and abusing her children. I actually have a court provided audio transcript of those proceedings if you'd like to hear them. Brockton District Court also EXPUNGED all records of criminal court appearances relating to the Freeborn family. They are gone, no longer available for discussion in or out of any court.

The Freeborns were 'forced' to move from our condo area about 7 years ago, by the concerted effort of all the neighbors, because she was clearly a trouble maker. She told no one where she was going and no one really wanted to know. Another good solid witness for Delmonte!

Jessie Brown and Sharon Saunders would love to provide information concerning all the issues you feel the need to pursue. Of course, they are my witnesses.

If I can provide you with any further witness info please just ask.

What I would like from you in the matter of documents is a new (dated after you receive this document) copy of my criminal record, both from the FBI and Massachusetts.

Respectfully Submitted,



Laurence Brown, Plaintiff, pro se

08/20/19

20 Virginia Dr.

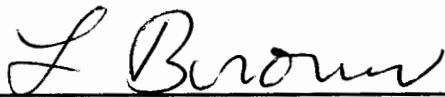
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CERTIFICATE OF SERVICE

I hereby certify that I delivered this document to Thomas Donohue by email to tdonohue@bhpklaw.com on this date.



Laurence Brown, plaintiff